

### **REMARKS**

Applicants appreciate the thorough examination of the present application as evidenced by the Final Action. Applicants submit that the present rejections should be withdrawn for at least the reasons discussed below. Applicants acknowledge that Claims 9, 12-15, 19-23, 29 and 49-58 have been withdrawn responsive to the previous election requirement. However, as Applicants believe patentable generic claims are presented, Applicants have included the withdrawn claims in the listing of claims for the Examiner's reference.

Applicants note that the present rejections generally follow the rejections in the previous Office Action. To expedite the Examiner's reconsideration, only the newly raised matters will be addressed below. However, to assure that this submission is considered fully responsive to the Office Action, Applicants' previous Amendment is incorporated fully herein by reference as if set forth in its entirety.

#### **The Prior Art Rejections:**

Claims 1, 5-8, 10-11, 16-18, 24-28, 30-35, 37-38 and 40-48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Painter, Jeffrey E., "Navigation System that Supports Multiple Languages and Format," which Applicants understand to correspond to European Patent Application No. EP1300655 to Painter ("Painter"), in view of United States Patent Application Publication No. 2004/0139388 to Vora ("Vora"). Final Action, p. 2. Claims 2-4, 36 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Painter and Vora in view of United States Patent No. 5,860,073 to Ferrel et al. ("Ferrel "). Final Action, p. 13. Claims 33 and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Painter and Vora in view of Microsoft Technet, "Comparing Windows XP Professional Multilingual Options," December 1, 2001 ("Microsoft"). Final Action, p. 15. Applicants respectfully submit the rejected claims are allowable at least for the reasons further discussed below.

Based on the review of the Final Action by the Applicants' undersigned representative, the rejections are unchanged except for the addition of some additional discussion of Vora in

the rejections of Claims 1, 44-45 and 47. Final Action, p. 4. As this additional language also appears in the Response to Arguments Section, only the Response to Arguments will be addressed below.

As well as Applicants can understand, in response to Applicants' previous arguments related to the recitations of Claim 1 that a style sheet is retrieved that is "associated with the **message type of the data record and with the selected language**," the Final Action is now relying on the various possible output forms ("such as HTML, XML, WML, HDML, and VoiceXML") as disclosing the recited plurality of message types. Final Action, pp. 4, 16-17. The rejection does appear to acknowledge that such are not message types of the received data record, but asserts that the "claim does not necessarily require the message type be sent with the data record, just that the 'received data record' comprises a message type at some point before it is displayed." Final action, p. 17.

As an initial matter, Applicants submit the interpretation being applied is overly broad as the reference to the "received data record comprises ... a message type selected from a plurality of message types ... retrieving a style sheet associated with the message type of the data record." The only antecedent basis for either received data record or the data record as recited above is in the phrase "receiving a data record." Thus, the received data record clearly refers to the message as received, not a processed version thereof. For example, in Claim 2, wherein the operation of "formatting the data record" creates such a processed version, the displaying operation recites "the data record formatted based on the second style sheet" to make it clear that a processed version of the data record is displayed, not the received data record in its unprocessed form.

Furthermore, even if the interpretation of the Final Action were to be applied, Vora would still not disclose or suggest the message types of Claim 1. In particular, to the extent the listed output forms of Vora can be considered to represent message types, they are types associated with the target destination devices 116, 118, 110, 112, 114. These output forms are not associated with the received MXML document 104. Vora, Paragraphs 47-48. In other words, different formats are applied based on identified communication protocols for respective destination devices, not based on the received document 104. In fact, Vora

emphasizes the advantages of the use of a single MXML document 104 as the input, which can then be transformed to different destination device communication formats from a known common input document type. See, e.g., Vora, Paragraph 49 ("document can be written once in device-independent MXML form ...can potentially save a considerable amount of programmer time."). As such, if anything, Vora teaches away from the message types of the received data records as recited in Claim 1. Accordingly, the rejections of Claims 1 and 44 and the claims that depend therefrom should be withdrawn for at least these reasons.

With respect to independent Claims 27, 32, 46 and 48, Applicants note that the arguments submitted in Applicants' previous Amendment are not even acknowledged in the Final Action. Accordingly, the rejections should be withdrawn at least for the previously presented reasons. If they are not, Applicants respectfully request some response from the Examiner as to why these arguments were not considered persuasive. To expedite the Examiner's reconsideration of the rejections, the previous arguments will now be reproduced.

**Independent Claims 27, 32, 46 and 48 are Patentable:**

Independent Claim 27 recites, among other things, generating data values **and** further incorporating the generated data values and an identification of a style sheet in a language independent markup document **at a first data processing system**, followed by forwarding the language independent markup document **from the first data processing system to a second data processing system**. In other words, the system creating a markup document including both data and a style sheet identification is the system generating the data. Independent Claims 32, 46 and 48 contain corresponding recitations.

In rejecting Claims 27, 32, 46 and 48, the Office Action acknowledges such recitations are not disclosed by Painter. However, the Office Action asserts that such recitations are disclosed by "Vora's locale attribute which determines what stylesheet to apply in order to display the data record." Office Action, p. 9. However, as described in the discussion of Vora above, the locale attribute of Vora is input by a programmer to the application server 105 that receives and translates the MXML document 104 for local display, it is not included in the MXML document 104 by the device generating the MXML document 104. The application server 105 is alleged to be the first data processing system in the rejections, the translated document 104 is not in a language independent format when forwarded to a selected output device 112, 114, 116, 118. In fact, the no "identification of a style sheet" or the locale attribute is ever included in the MXML document 104, it is a separate parameter passed to the translate application as discussed above. Accordingly, the rejections of independent Claims 27, 32, 46 and 48 and the claims that depend therefrom should be withdrawn

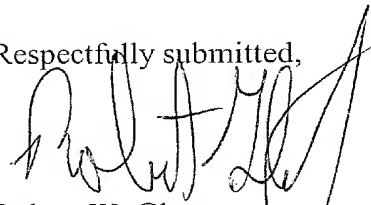
In re: Cheng et al.  
Serial No.: 10/609,987  
Filed: June 30, 2003  
Page 18

for at least these reasons.

### Conclusion

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,

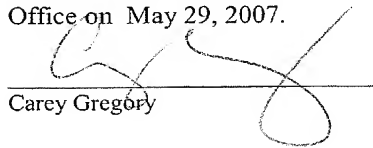


Robert W. Glatz  
Registration No. 36,811

**Customer No. 20792**  
Myers Bigel Sibley & Sajovec  
P. O. Box 37428  
Raleigh, North Carolina 27627  
Telephone: (919) 854-1400  
Facsimile: (919) 854-1401

### CERTIFICATION OF TRANSMISSION

I hereby certify that this correspondence is being transmitted electronically to the U.S. Patent and Trademark Office on May 29, 2007.



Carey Gregory